



THE CITY OF NEW YORK
LAW DEPARTMENT
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April 17, 2025


The request for a 30-day extension is granted. The post-discovery status conference currently scheduled for April 24, 2025, is rescheduled to May 28, 2025, at 3:30 p.m. Parties are directed to dial into the Court's new teleconference number at 646-453- 4442, use conference ID# 358639322, and follow the necessary prompts. The proposed amended case management plan will be entered by separate order.

BY ECF

Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Date: 4/18/25

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Re: Tyrone Creighton v. City of New York, et al.,
23-CV-4497 (LJL)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing defendants the City of New York, Donald Sehl, and UC0366 (hereinafter "defendants") in the above-referenced matter. Defendants respectfully write to request a 30-day extension of time to complete fact discovery in this matter from April 21, 2025 to May 21, 2025, and an adjournment of the status conference scheduled for April 24, 2025 to a date after fact discovery is completed. This is defendants' second request for an extension of time to complete fact discovery, and first request to adjourn the conference scheduled for April 24, 2025. Plaintiff's counsel, Evan Brustein, consents to these requests. I filed a request for an extension of time to complete fact discovery on March 19, 2025 (Dkt. No. 38), and the Court granted that request.

The reason for these requests is that, while the parties have exchanged some additional document discovery, the parties must still resolve deficiencies in plaintiff's discovery responses that were recently served on April 4, 2025, and need to complete depositions. The parties have agreed that defendants will send plaintiff a proposed Protective Order regarding the named Undercover Officer's deposition, and will provide each other with the plaintiff's and Undercover

Officer's deposition availability within one week of today. Attached hereto is defendants' proposed revision to the Scheduling Order.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Joseph M. Hiraoka, Jr.

Joseph M. Hiraoka, Jr.
Senior Counsel
Special Federal Litigation Division

Encl.

cc: **By ECF**
Evan Brustein, Esq.
Attorney for plaintiff